

RECEIVED

MAY 20 2019

AT 8:30
WILLIAM T. WALSH
CLERK

United States District Court
District of New Jersey

) Craig Cunningham
) Plaintiff, Pro-se
)

) v.
)

CIVIL ACTION NO. 3:17-cv-13050

) Capital Advance Solutions, LLC
)

) Defendants.
)

Plaintiff's Motion for a Default Judgment and Request for a hearing to determine damages against Capital Advance Solutions, LLC

1. To the honorable US District Court:

The Plaintiff seeks a default judgment against Capital Advance Solutions, LLC

2. Capital Advance Solutions has already had the clerk's entry of default entered against them as of May 8th 2019, per documents 61 and 62.
3. Accordingly, the Plaintiff seeks a default judgment against Capital Advance Solutions, LLC for the 21 calls alleged in the complaint.
4. The Plaintiff alleges that the calls should be deemed willful and knowing and as such the Plaintiff is entitled to \$1500 per call for violations of 47 USC 227(b) and \$1500 per call for 47 USC 227(c)(5) or \$3,000 per call x 21 calls for \$63,000 in damages plus costs of filing of \$400 and service of \$200 and travel of \$500.
5. The Plaintiff requests a hearing to determine damages per FRCP 55(b)(2). Due to prior scheduling commitments including travel outside the country and a trial scheduled on June 10th, the Plaintiff requests the hearing for damages be after June

11th 2019.

Craig Cunningham

Plaintiff, Pro-se 3000 Custer Road ste 270-206 Plano, Tx 75075

5/15/2019

N TEXAS
DALLAS 750
15 MAY '19
PM 3 L

3000 Custer Rd
Ste 20-206
Plano TX 75075

US District Court
402 E. State Street
Clerk's Office
Trenton, NJ 08608



08608-150705

